

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JOHN N. CASTELLANO, III

Plaintiff,

v.

VERNON BETTS, et al.,

Defendants.

Case No. 4:19-CV-02304-SRC

AFFIDAVIT OF VERNON BETTS

COMES NOW affiant, Vernon Betts, and having been duly sworn and upon his oath states:

1. I make this affidavit based upon my personal knowledge of the facts referenced herein and am competent to testify to the same.
2. I was elected Sheriff for the City of St. Louis in November 2016 and have held that office since January 2017.
3. All staff roll calls are held in the 4th floor ceremonial courtroom in the Civil Courts building.
4. I frequently discuss that poor attitudes will not be tolerated and that members of the Sheriff's Department must live up to the qualities of honesty, loyalty and integrity that they wear on their sleeves.
5. I recall holding a January 2019 all staff roll call and although I don't specifically remember saying anything about firing people with bad attitudes, I very well could have.
6. I have never walked up to John Castellano or specifically looked at him during any roll call. Generally speaking, I stay at the front of the room and occasionally take a few steps down the aisle at all staff roll calls.
7. I recall specifically announcing at the March 2019 all staff roll call that I was disappointed that more people had not signed up to participate in the upcoming May Day parade, particularly compared to the large group that volunteered for the St. Patrick's Day parade, and that those who don't want to participate were on my "shit list". The discussion of my "shit list"



was exclusively related to the lack of engagement regarding the upcoming May Day parade and had nothing to do with promotions.

8. I take a lot of pride in the Sheriff's Office participation in the May Day parade each year, particularly as a former St. Louis Public School educator. The May Day parade benefits Annie Malone Children's Home and I taught a number of students throughout my career who personally benefitted from Annie Malone's.

9. It was clear from my comments that the way to get off my shit list was to participate in the May Day parade.

10. Another reason I wanted increased participation in the May Day parade is that everyone in the Department is encouraged to bring their children and their families, and everyone who participates is invited back to the Sheriff's Office afterwards for a large cookout. I consider it a great opportunity for fellowship across the Department.

11. Tyrone Williams approached me after the roll call and advised that he had a sincere conflict with the May Day parade but wanted to show that he really wished he could participate. He asked me how he could show his sincerity and I told him I did not know. Tyrone then suggested without any prompting from me that he would like to contribute towards the cookout held after the parade as a gesture that he wished he could be there. I agreed that was a great idea. Tyrone asked me how much to contribute, and I advised I could not tell him an amount, but anything would be appreciated.

12. Tyrone did not give me his donation. It is my understanding that he provided Cpt. Tammy Hogan with whatever his donation was.

13. I cannot speak to the unnamed individuals that Mr. Castellano alleges told him to give money to my campaign, but I have never sought, accepted, or instructed anyone else to seek campaign contributions on my behalf as favors.

14. At the time I promoted McGinnist, Evans, and Allen as sergeants within Courts I was not aware that Mr. Castellano alleges he is a POST certified instructor, an active shooter instructor, has US Marshal training, or experience as an "acting" sergeant.

15. Lt. Dawn Kehoe-Roop has been in charge of training classes since prior to my election as Sheriff. She has my absolute confidence in making decisions as to what resources, including personnel, she needs to conduct trainings.

16. Lt. Kehoe-Roop has never asked me if Mr. Castellano can assist her in trainings, and I have never stated or suggested that he cannot.

17. No one in the City of St. Louis Sheriff's Office has ever suggested or recommended Mr. Castellano to me for promotion.

Further affiant sayeth not.

Vernon Betts

Vernon Betts
Sheriff
City of St. Louis Sheriff's Office

STATE OF MISSOURI)
)
CITY OF ST. LOUIS)

Subscribed and sworn to before me this 18th day of November 2020.

Tammy R. Hogan

NOTARY PUBLIC

My commission expires: Mar. 3, 2024

